

1 DAVID CHIU, State Bar # 189542
City Attorney
2 YVONNE R. MERE, State Bar # 173594
Chief Deputy City Attorney
3 SARA J. EISENBERG, State Bar # 269303
Chief of Complex & Affirmative Litigation
4 OWEN J. CLÉMENTS, State Bar # 141805
JAIME M. HULING DELAYE, State Bar # 270784
5 JOHN H. GEORGE, State Bar # 292332
Deputy City Attorneys
6 Fox Plaza
1390 Market Street, Sixth Floor
7 San Francisco, CA 94102
Telephone: 415.554.3597
8 jaime.hulingdelaye@sfcityatty.org

9 *Attorneys for Plaintiff The People of the State of*
California, acting by and through San Francisco
10 *City Attorney David Chiu*

11 [Additional counsel appear on signature page.]

12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA

14 SAN FRANCISCO DIVISION

15 THE CITY AND COUNTY OF SAN
FRANCISCO, CALIFORNIA and THE PEOPLE
16 OF THE STATE OF CALIFORNIA, Acting by
and through San Francisco City Attorney DAVID
17 CHIU,

18 Plaintiffs,

19 v.

20 PURDUE PHARMA L.P., et al.

21 Defendants.

Case No. 3:18-cv-07591-CRB

**THE PEOPLE'S NOTICE OF FILING
OF COURT EXHIBITS**

Hon. Charles R. Breyer

The People give notice of the filing of the following court exhibits used by The People during the above-captioned trial:

Court Exhibit	Exhibit Description
CT4-DEMO-001	David A. Kessler, M.D. preservation deposition slide deck
CT4-DEMO-002	Responsiveness of Physician Prescription Behavior to Salesforce Effort: An Individual Level Analysis by Puneet Machanda and Pradeep K. Chintagunta
CT4-DEMO-004	Chintagunta cross (shown in court 6.13.2022)
CT4-DEMO-054	Slides Macey Cross Exam
CT4-HERZBERG-DEMO-001	Herzberg Slide deck
CT4-JEZIORSKI-DEMO-001	Jeziorski Slide deck
CT4-KELLER-DEMO-001	Lacey Keller Slide deck
CT4-KEYES-DEMO-001	Katherine Keyes Slide deck
CT4-LEMBKE-DEMO-0001	Anna Lembke Slide deck
CT4-MCCANN-DEMO-0001	SF SOMs - Nonrecurrent
CT4-MCCANN-DEMO-0002	SF SOMs - Recurrent
CT4-MCCANN-DEMO-0003	Rebuttal Expert Report of Craig J. McCann, PH.D, CFA, Rebuttal Appendix 1, Summary of Dispensing Red Flag Analysis All Walgreens Stores
CT4-MCCANN-DEMO-0004	Rebuttal Expert Report of Craig J. McCann, PH.D, CFA, Rebuttal Appendix 2, Summary of Dispensing Red Flag Analysis 12 Walgreens Stores
CT4-MCCANN-DEMO-0005	Summary of Walgreens Opioid Dispensing Red Flag Analysis
CT4-MCCANN-DEMO-0006	McCann CT4 Appendix 7 Processing the Dispensing Data
CT4-MCCANN-DEMO-0007	Opioid Prescriptions of Dr. Giovannini filled by Walgreens, All Bay Area
CT4-MCCANN-DEMO-0008	Opioid Prescriptions of Dr. Gores filled by Walgreens, All Bay Area
CT4-MCCANN-DEMO-0009	Opioid Prescriptions of Dr. Hattori filled by Walgreens, All Bay Area
CT4-MCCANN-DEMO-0010	Opioid Prescriptions of Dr. Leong filled by Walgreens, All Bay Area
CT4-MCCANN-DEMO-0011	Opioid Prescriptions of Dr. Pierce filled by Walgreens, All Bay Area
CT4-MCCANN-DEMO-0012	Opioid Prescriptions of Dr. Seet filled by Walgreens, All Bay Area

CT4-MCCANN-DEMO-0013	McCann CT4 Supplemental Report - Appendix 2 - Confidence Intervals for Sample Observations
CT4-MCCANN-DEMO-0014	95% Confidence Intervals for Samples of 2,191 Observations
CT4-MCCANN-DEMO-0015	12 Opioid Drug Shipments to All Dispensers in San Francisco County, CA
CT4-MCCANN-DEMO-0016	Manufacturer Attribution of Flagged Transactions in Dosage Units - Nonrecurrent
CT4-MCCANN-DEMO-0017	Flagging Transactions Attributable to Manufacturer Defendants in Dosage Units - Nonrecurrent
CT4-MCCANN-DEMO-0018	McCann CT4 Appendix 11c. Actavis_Watson Flagging Algorithm, pgs 427-435
CT4-MCCANN-DEMO-0019	McCann CT4 Appendix 11c. Actavis_Watson Flagging Algorithm, pgs 436-444
CT4-MCCANN-DEMO-0020	McCann CT4 Appendix 11c. Actavis_Watson Flagging Algorithm, pgs 445-453
CT4-MCCANN-DEMO-0021	McCann CT4 Appendix 11c. Actavis_Watson Flagging Algorithm, pgs 454-462
CT4-MCCANN-DEMO-0022	Moms Pharmacy Oxy 1471-1483
CT4-MCCANN-DEMO-0023	Castro Street - Oxy - 1497-1508
CT4-MCCANN-DEMO-0024	Craig McCann Slide deck
CT4-PERRI-DEMO-001	Table 1: Defendants' Sample Call Log Entries
CT4-PERRI-DEMO-002	Table 2: Opioid Marketing Messages
CT4-PERRI-DEMO-003	Schedule 6: Defendants' Marketing Plans
CT4-PERRI-DEMO-004	Schedule 8: Sales Training Manuals and Scripts
CT4-PERRI-DEMO-005	Schedule 10: Evaluation of Marketing Impact by Defendants
CT4-PERRI-DEMO-006	Schedule 11: Amounts Paid to Pain Advocacy Organizations & Professional Societies
CT4-PERRI-DEMO-007	Perri Schedule 9: Defendants' Call Notes (San Francisco)
CT4-PERRI-DEMO-008	Perri Schedule 12: Amounts Paid to KOLs by Defendants
CT4-PERRI-DEMO-009	Matthew Perri Background Information
CT4-SHORT-DEMO-001	Photos to use with Carla Short

DATED: June 16, 2022

David Chiu
City Attorney
Yvonne R. Mere
Sara J. Eisenberg
Owen J. Clements

Respectfully submitted,

LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP
/s/ Kevin R. Budner
Elizabeth J. Cabraser
Richard M. Heimann
Mark P. Chalos

Jaime M. Huling Delaye
John H. George
Deputy City Attorneys
Fox Plaza
1390 Market Street, Sixth Floor
San Francisco, CA 94102
Telephone: 415.554.3957
jaime.hulingdelaye@sfcityatty.org

Paulina do Amaral
Kevin R. Budner
Michael Levin-Gesundheit
Jacob Polin
Miriam Marks
Ian Bensberg
LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, California 94111-3339
Telephone: 415.956.1000
Facsimile: 415.956.1008
kbudner@lchb.com

Paul J. Geller
Mark J. Dearman
Dorothy P. Antullis
robbins geller rudman & DOWD LLP
120 East Palmetto Park Road, Suite 500
Boca Raton, FL 33432
Telephone: 561/750-3000
561/750-3364 (fax)
pgeller@rgrdlaw.com

Aelish M. Baig
Hadiya K. Deshmukh
ROBBINS GELLER RUDMAN & DOWD
LLP
Post Montgomery Center
One Montgomery Street, Suite 1800
San Francisco, CA 94104
Telephone: 415/288-4545
415/288-4534 (fax)
aelishb@rgrdlaw.com

Louise Renne
RENNE PUBLIC LAW GROUP
350 Sansome Street, Suite 300
San Francisco, CA 94104
Telephone: 415/848-7240
415/848-7230 (fax)
lrenne@publiclawgroup.com

Thomas E. Egler
Carissa J. Dolan
ROBBINS GELLER RUDMAN & DOWD
LLP
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)
tome@rgrdlaw.com

Kevin Sharp
SANFORD HEISLER SHARP, LLP
611 Commerce Street, Suite 3100
Nashville, TN 37203
Telephone: 615/434-7000
615/434-7020 (fax)
ksharp@sanfordheisler.com

Jennie Lee Anderson
Paul Laprairie
ANDRUS ANDERSON LLP
155 Montgomery Street, Suite 900
San Francisco, CA 94104
Telephone: 415/986-1400
415/986-1474 (fax)
jennie@andrusanderson.com

David S. Casey, Jr.
Gayle M. Blatt
Alyssa Williams
CASEY GERRY SCHENK FRANCAVILLA
BLATT & PENFIELD LLP
110 Laurel Street
San Diego, CA 92101-1486
Telephone: 619/238-1811
619/544-9232 (fax)
dcasey@cglaw.com

Edward Chapin
SANFORD HEISLER SHARP, LLP
655 West Broadway, Suite 1700
San Diego, CA 92101
Telephone: 619/577-4253
619/577-4250 (fax)
echapin2@sanfordheisler.com

1 gmb@cglaw.com
awilliams@cglaw.com

2 Paul F. Novak
3 Tiffany Ellis
WEITZ & LUXENBERG, P.C.
4 24th Floor, The Fisher Building
3011 W. Grand Boulevard
5 Detroit, Michigan 48202
Tel: (313) 800-4170
6 pnovak@weitzlux.com
tellis@weitzlux.com

Ellen Relkin
WEITZ & LUXENBERG P.C.
700 Broadway
New York, NY 10003
Telephone: 212/558-5500
212/344-5461 (fax)
erelkin@weitzlux.com

7 *Attorneys for Plaintiff The People of the State of California, acting by and through San*
8 *Francisco City Attorney David Chiu*

9 Jayne Conroy (*pro hac vice*)
10 Andrea Bierstein (*pro hac vice*)
Ellyn Hurd (*pro hac vice*)
11 Justin Presnal (*pro hac vice*)
Tom Sheridan (*pro hac vice*)
12 SIMMONS HANLY CONROY LLC
112 Madison Avenue, 7th Floor
13 New York, NY 10016
(212) 784-6400
14 (212) 213-5949 (fax)
jconroy@simmonsfirm.com
15 abierstein@simmonsfirm.com
ehurd@simmonsfirm.com
16 jpresnal@simmonsfirm.com
17 tsheridan@simmonsfirm.com

Peter J. Mougey (*pro hac vice*)
Page A. Poerschke (*pro hac vice*)
Laura S. Dunning (*pro hac vice*)
Jeff Gaddy (*pro hac vice*)
18 LEVIN, PAPANTONIO, RAFFERTY,
19 PROCTOR, BUCHANAN, O'BRIEN, BARR
& MOUGEY, P.A.
316 S. Baylen St., Ste. 600
20 Pensacola, FL 32502
(850) 435-7068
pmougey@levinlaw.com
21 ppoerschke@levinlaw.com
ldunning@levinlaw.com
22 jgaddy@levinlaw.com

23
24
25
26
27
28
MDL Co-Lead, Plaintiff Executive Committee Counsel